

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OCT 15 2021
RICK WARREN
COURT CLERK

125

Oklahoma Department of Securities)
ex rel. Melanie Hall,)
Administrator,)
Plaintiff,)
v.)
Premier Global Corporation;)
Premier Factoring, LLC;)
Premier Factoring Group, LLC;)
PF-2, LLC; PF-3, LLC; PF-4, LLC;)
PF-5, LLC; PF-6, LLC; and PF-7, LLC,)
Defendants.)

Case No.

CJ-2021-4397

APPLICATION FOR ORDER ENFORCING ADMINISTRATIVE SUBPOENAS
AND
AUTHORITY IN SUPPORT

Plaintiff, Oklahoma Department of Securities ("Department") ex rel. Melanie Hall, Administrator, moves this Court for an order enforcing certain administrative subpoenas issued pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. Ann. tit. 71, §§ 1-101 through 1-701 (West 2021) to the following entities: Premier Global Corporation; Premier Factoring, LLC; Premier Factoring Group, LLC; PF-2, LLC; PF-3, LLC; PF-4 LLC; PF-5, LLC; PF-6, LLC and PF-7, LLC (collectively referred to as "Defendants").

DEFENDANTS

1. Premier Global Corporation ("Premier") is a Kansas corporation with its principal place of business in Derby, Kansas. The remaining defendants are, according to offering documents provided to investors, entities formed by Premier to

engage in the business of factoring invoices (the "PF Entities"). Also, according to the representations in the offering documents, each PF Entity conducts a securities offering to investors of promissory notes bearing an annual interest rate of ten (10) to fifteen (15) percent and having a term of one (1) year (the "Notes"). The stated purpose of each offering and the source of revenue to repay investors is clearly described in the offering documents as the factoring and collection of invoices.

2. Defendants are believed to have received in excess of \$100 million from numerous investors in nineteen (19) states, including a large number of investors who are residents of the state of Oklahoma.

3. The securities offered and sold in Oklahoma have not been registered under the Act, no notice of a claim of exemption from such registration has been filed with the Administrator, and Defendants have failed to identify any specific exemption from registration under the Act for their offers and/or sales of securities to Oklahoma investors.

BACKGROUND

4. The Administrator received information indicating possible violations of the Act in connection with the offer and sale of securities by the Defendants, their principal officers and agents.

5. The Administrator initiated an investigation into the offer and sale of those securities pursuant to Section 1-602(A) of the Act, which provides in part:

The Administrator may:

- (1) Conduct public or private investigations within or outside of this state which the Administrator considers necessary or appropriate to determine whether a person has violated, is

violating, or is about to violate this act or a rule adopted or order issued under this act, or to aid in the enforcement of this act or in the adoption of rules and forms under this act[.]

6. The Administrator issued the subpoenas attached as *Exhibits A-I* (the "Subpoenas") to Defendants pursuant to Section 1-602(B) of the Act, which provides:

For the purpose of an investigation or proceeding under this act, the Administrator or its designated officer may administer oaths and affirmations, subpoena witnesses, seek compulsion of attendance, take evidence, require the filing of statements, and **require the production of any records that the Administrator considers relevant or material to the investigation or proceeding** (emphasis added).

7. The Subpoenas are all virtually identical and required that Defendants produce certain documents on or before the time frames specified in the Subpoenas to the offices of the Department.

8. The Department served the Subpoenas upon Defendants by certified mail, return receipt requested and delivery restricted to the addressee. Copies of the delivery receipts are attached as the last pages of *Exhibits A-I* respectively.

9. All Defendants are represented by the same counsel. Defendants have produced numerous documents responsive to the Subpoenas generally but have objected to one category of document production, that is, Item 5 of each Subpoena which requires production as follows:

5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.

10. In their responses to Item 5 of the Subpoenas, counsel for Defendants objected as follows (each response to Item 5 is also virtually identical):

RESPONSE: [PF Entity] objects to Request No. 5 on the grounds that producing all invoices and receivables acquired and/or purchased would be overly broad and unduly burdensome and not proportional to the goals of the investigation. The number of records is significant. [PF Entity] will update this response when it determines the scope and breadth of documents responsive to this request.

11. On November 24, 2020, counsel for Defendants reiterated the objection to Item 5 of the Subpoenas but produced a group of documents *of their choosing* and described the document production group as a “large sample”. A copy of the correspondence is attached as *Exhibit J*. The limited sample consisted almost entirely of invoices from a single factoring customer covering days selected by Defendants. Such production is neither an accurate representative sample nor is it compliant with the Subpoenas. It is nothing more than Defendants providing limited documents of their choosing.

12. Following months of attempting to negotiate the production of the remaining documents, Defendants have continually refused to produce the remainder of the subpoenaed documents. On July 21, 2021, a member of the enforcement staff of the Department specifically asked counsel for Defendants whether they would produce a greatly reduced sample, from the time period covered by the Subpoenas, with supporting documentation, of the documents called for by Item 5 of the Subpoenas. Counsel for Defendants suggested that if the Department were to provide specific dates for such a sample, he would discuss the matter with his clients and provide an answer as soon as possible.

13. On July 30, 2021, the enforcement staff of the Department met with counsel for Defendants at the offices of the Department. At that time, counsel for Defendants produced a single representative sample of the items intended to be responsive to Item 5 of the Subpoenas along with the accompanying bank records relating to the invoice factoring activity. The sample did not satisfy the document production required.

14. For months following the July 30, 2021 meeting, the staff of the Department communicated with counsel for Defendants by email, telephone and video conference, attempting in good faith to negotiate a greatly reduced sampling of the documents called for by the Subpoenas. Despite those efforts, there has been no resolution.

15. At the request of counsel for Defendants, the staff of the Department provided a lengthy and detailed email on August 12, 2021, clarifying a more basic scope of the negotiated document production. See *Exhibit K* attached hereto.

16. On September 3, 2021, while the Department continued to discuss in good faith the production of documents called for by Item 5 of the Subpoenas and greatly reducing the requested time frame, counsel for Defendants advised the Department that production of additional documents by Premier and the PF Entities would be overly burdensome.

17. On September 10, 2021, the staff of the Department sent an email, confirming a telephone conference from the prior day, where counsel for Defendants stated that he would provide a written response to the August 12, 2021 email and produce documents responsive to the Subpoenas. See *Exhibit L* attached hereto.

18. Finally, on October 8, 2021, the staff of the Department flatly asked whether the reduced sampling of documents would be produced. Counsel for Defendants advised the Department that he could not answer that question.

19. A partial list of efforts to negotiate production since July 30, 2021 includes over eighteen (18) emails or telephone conference calls and three (3) video conference meetings. Each time, counsel for Defendants either requested extensions of time due to scheduling conflicts and/or most recently advised the Department that even a greatly reduced sampling of documents would not be produced because it would be too burdensome.

20. Fourteen (14) months after the issuance of the Subpoenas and following a greatly reduced request and numerous communications, the Administrator has received only a select sample of documents responsive to Item 5 of the Subpoenas. Defendants' invoice factoring activity is a core issue in this investigation. Considering the scope of the Department's investigation, the number of investors and investment funds involved and the type of business activity being engaged in by Defendants, compliance with Item 5 of the Subpoenas is critical.

AUTHORITY

Pursuant to Section 1-602 of the Act, the Administrator has the authority to apply to this Court to enforce compliance with the Subpoenas. Subsection C of Section 1-602 of the Act provides as follows:

C. If a person does not appear or refuses to testify, file a statement, **produce records, or otherwise does not obey a subpoena** as required by the Administrator under this act, the Administrator may apply to the district court of Oklahoma County or the district court in any other

county where service can be obtained or a court of another state to enforce compliance (emphasis added). The court may:

1. Hold the person in contempt;
2. Order the person to appear before the Administrator or an officer designated by the Administrator;
3. Order the person to testify about the matter under investigation or in question;
4. Order the production of records;
5. Grant injunctive relief, including restricting or prohibiting the offer or sale of securities or the providing of investment advice;
6. Impose a civil penalty up to a maximum of Five Thousand Dollars (\$5,000.00) for a single violation or Two Hundred Fifty Thousand Dollars (\$250,000.00) for multiple violations in a single proceeding or a series of related proceedings; and
7. Grant any other necessary or appropriate relief.

“The Oklahoma Securities Commission and the Oklahoma Department of Securities are created by statute, with the Commission as the policy-making and governing authority of the Department. 71 O.S. Supp.2003 § 1–601(B). The Oklahoma Department of Securities (or Department), as a public agency, possesses those powers expressly granted by law, by constitution or statute, *and such powers as are necessary for the due and efficient exercise of the powers expressly granted*, or such as may be fairly implied from the constitutional provision or statute granting the express powers. *Oklahoma Public Employees Ass’n v. Oklahoma Dept. of Central Services*, 2002 OK 71, ¶¶ 25–27, 55 P.3d 1072, 1083–1084 (emphasis added)”. *Oklahoma Dep’t of Sec. ex rel. Faught v. Blair*, 2010 OK 16, ¶ 9, 231 P.3d 645, 651–52, *as corrected* (Apr. 6, 2010).

CONCLUSION

Compliance with the Subpoenas is vital for the effective enforcement of the Act by the Administrator in this matter. As described above, Premier and the PF Entities have raised millions of dollars from investors across the country including a large number who are residents of the state of Oklahoma.

An issuer of securities cannot be allowed to impede the regulatory functions and public policy behind the Act by refusing to comply with a validly issued, properly served subpoena that is directly relevant to the purposes of the Act. Defendants cannot be allowed to determine the scope of an investigation or to produce only those records *they* deem “proportional to the goals of the investigation.”

The production of records called for in Item 5 of the Subpoenas may be voluminous but Premier has chosen to engage in a business that is a document intensive enterprise. Defendants have also chosen to finance that business by raising millions of dollars from investors in a manner that requires compliance with the Act. To allow Defendants to then dictate their manner of compliance with properly issued Subpoenas is contrary to both the plain language of the Act and public policy. Consequently, judicial enforcement of the Subpoenas is critical.

WHEREFORE, the Administrator requests that this Court issue an order enforcing compliance with the Subpoenas by requiring Defendants to produce the requested records directly related to the matter under investigation; enjoining Defendants from the offer and sale of securities until such time as they have complied with the Subpoenas; and imposing a civil penalty, jointly and severally, in the amount of \$250,000.00.

Respectfully submitted,

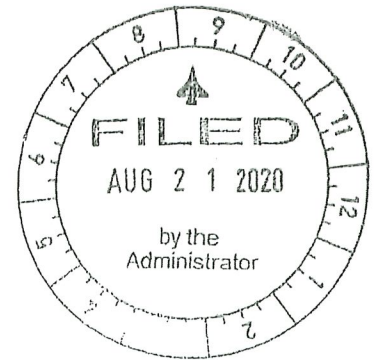
OKLAHOMA DEPARTMENT OF SECURITIES
MELANIE HALL, ADMINISTRATOR

By:



Shaun Mullins, OBA No. 16869
Jennifer Shaw, OBA No. 20839
Patricia Labarthe, OBA No. 10391
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700
Fax (405) 280-7742
Email: smullins@securities.ok.gov
jshaw@securities.ok.gov
plabarthe@securities.ok.gov

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: Premier Global Corporation


ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)



Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **Premier Global Corporation**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.
2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.
3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.
4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.
5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **Premier Global Corporation** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

Premier Global Corporation
Jeffrey Frazee, Resident Agent
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111

PREMIER GLOBAL CORPORATION

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action
and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and
Appendix "A"

SERVED: PREMIER GLOBAL CORPORATION

METHOD SERVED: by serving Steve Parish, CEO of Premier Global
Corporation

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/28/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that
under the penalty of perjury that the foregoing is true in substance and in fact to my best
Information and belief.

Executed on this 31st day of August 2020

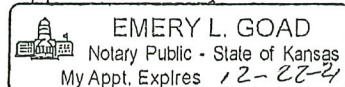
Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

Notary Public

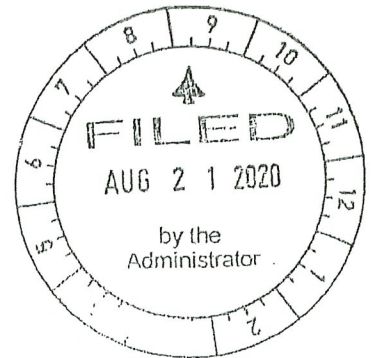
8-31-20
Date

12-22-21
Appointment Expires



250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: Premier Factoring, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)



Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **Premier Factoring, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.
2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.
3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.
4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.
5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo! TM Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media PlayerTM; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.

11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.

12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.

13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.

14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.

15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.

16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.

17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **Premier Factoring, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

Premier Factoring, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

PREMIER FACTORING, LLC

ODS File No. 21-005

111

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action
and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and
Appendix "A"

SERVED: PREMIER FACTORING, LLC

METHOD SERVED: by serving Steve Parish, CEO of Premier Factoring, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that
under the penalty of perjury that the foregoing is true in substance and in fact to my best
Information and belief.

Executed on this 31st day of August 2020

Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

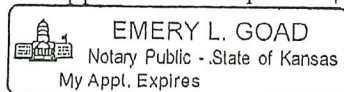
Notary Public

8-31-20

Date

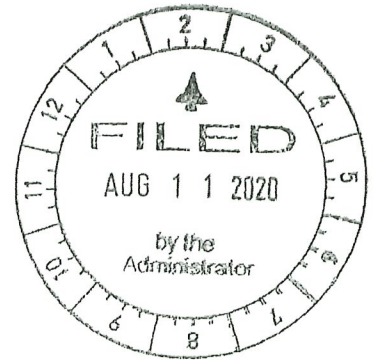
12-22-21

Appointment Expires



250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: Premier Factoring Group, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Wednesday, September 2, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 11th day of August, 2020.

(SEAL)

Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **Premier Factoring Group, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.

2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.

3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.

4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.

5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **Premier Factoring Group, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of August, 2020, a true and correct copy of the above and foregoing *Subpoena* was mailed by certified mail, restricted delivery, return receipt requested, with postage prepaid thereon, addressed to:

Premier Factoring Group, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037


Brenda London, Paralegal

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 11, 2020

Premier Factoring Group, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

Subp 21-005 smm

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Premier Factoring Group, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037



9590 9402 2617 6336 3885 35

2. Article Number (Transfer from service label)

7016 1970 0001 1606 7970

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

MT

☐ Agent

☐ Addressee

B. Received by (Printed Name)

McKean Port

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

C19 C09

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☒ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Mail

Mail Restricted Delivery
(0)

☐ Priority Mail Express®

☐ Registered Mail™

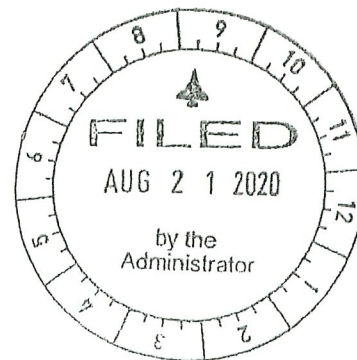
☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-2, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)


Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-2, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.
2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.
3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.
4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.
5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-2, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

PF-2, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111 _____

PF-2, LLC

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action
and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and
Appendix "A"

SERVED: PF-2, LLC

METHOD SERVED: by serving Steve Parish, CEO of PF-2, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

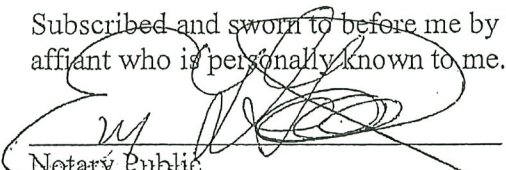
DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that
under the penalty of perjury that the foregoing is true in substance and in fact to my best
Information and belief.

Executed on this 31st day of August 2020

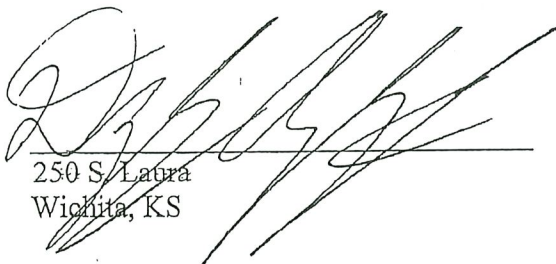
Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

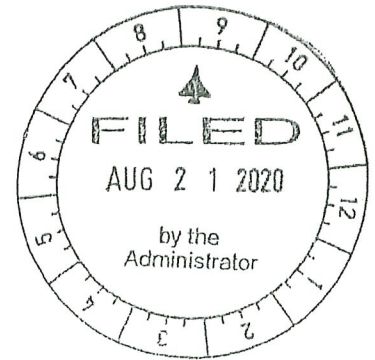

Notary Public

8-31-20
Date

12-22-21
Appointment Expires
EMERY L. GOAD
Notary Public - State of Kansas
My Appt. Expires


250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-3, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)

Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700

EXHIBIT

E

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-3, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.

2. As used herein, the term "*affiliate*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.

3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.

4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.

5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.

11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.

12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.

13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.

14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.

15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.

16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.

17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-3, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

PF-3, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111

PF-3, LLC

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and Appendix "A"

SERVED: PF-3, LLC

METHOD SERVED: by serving Steve Parish, CEO of PF-3, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that under the penalty of perjury that the foregoing is true in substance and in fact to my best Information and belief.

Executed on this 31st day of August 2020

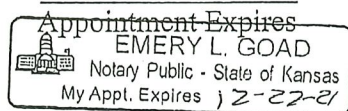
Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

Notary Public

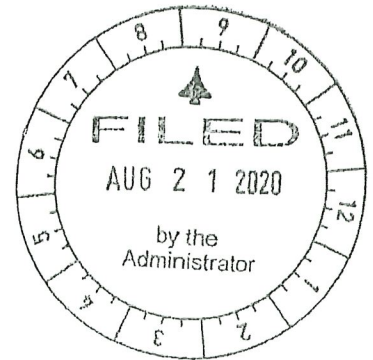
8-31-20

Date



250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-4, LLC

ODS File No. 21-005

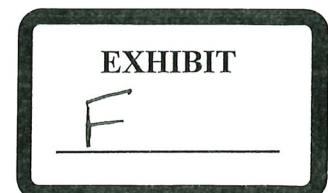
IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)


Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-4, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.

2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.

3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.

4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.

5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo! TM Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media PlayerTM; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-4, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

PF-4, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111

PF-4, LLC

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action
and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and
Appendix "A"

SERVED: PF-4, LLC

METHOD SERVED: by serving Steve Parish, CEO of PF-4, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that
under the penalty of perjury that the foregoing is true in substance and in fact to my best
Information and belief.

Executed on this 31st day of August 2020

Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

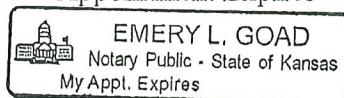
Notary Public

8-31-20

Date

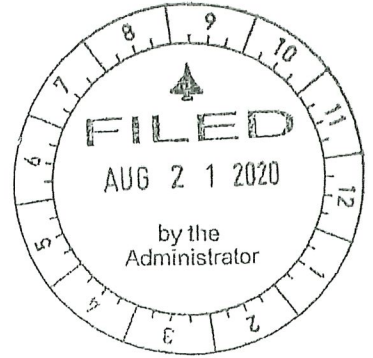
12-22-21

Appointment Expires



250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-5, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)

A handwritten signature in cursive script, appearing to read "Melanie Hall", written over a horizontal line.

Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-5, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.
2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.
3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.
4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.
5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-5, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

PF-5, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111

PF-5, LLC

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action
and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and
Appendix "A"

SERVED: PF-5, LLC

METHOD SERVED: by serving Steve Parish, CEO of PF-5, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that
under the penalty of perjury that the foregoing is true in substance and in fact to my best
Information and belief.

Executed on this 31st day of August 2020

Attorney: Shaun Mullins

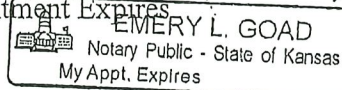
Subscribed and sworn to before me by the
affiant who is personally known to me.

Notary Public

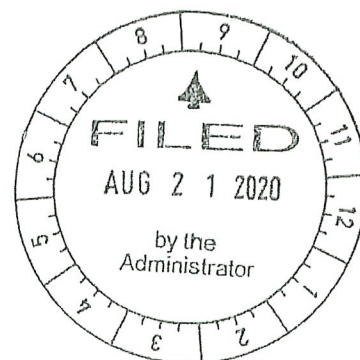
250 S. Laura
Wichita, KS

8-31-20
Date

12-22-21
Appointment Expires



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-6, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Tuesday, September 8, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 21st day of August, 2020.

(SEAL)

Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700



STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-6, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.
2. As used herein, the term "*affiliate*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.
3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.
4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.
5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-6, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 21, 2020

PF-6, LLC
Resident Agent Jeffrey Frazee
330 E. Madison Ave. Suite 201
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OK 73102

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

SEP - 9 2020

RICK WARREN
COURT CLERK

111

PF-6, LLC

ODS File No. 21-005

AFFIDAVIT OF SERVICE

Dwight Applegate

Kansas Statutory Process Server, he is not a party to this action and that he served process in this case in the manner and at the time described below.

PROCESS SERVED: Cover Letter, Subpoena, Definitions, Instructions, and Appendix "A"

SERVED: PF-6, LLC

METHOD SERVED: by serving Steve Parish, CEO of PF-6, LLC

PLACE SERVED: 620 N. Mulberry Road, Derby, KS

DATE SERVED: 8/27/2020 at 11:55am

Pursuant to K.S.A. 53-601, as amended, the undersigned declares that under the penalty of perjury that the foregoing is true in substance and in fact to my best Information and belief.

Executed on this 31st day of August 2020

Attorney: Shaun Mullins

Subscribed and sworn to before me by the
affiant who is personally known to me.

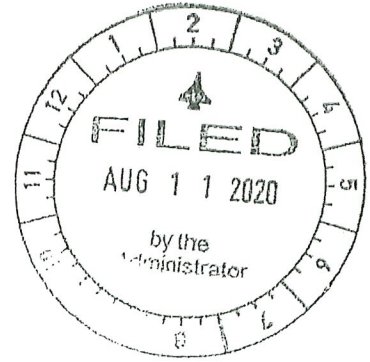
Notary Public

Date

Appointment Expires
Notary Public - State of Kansas
My Appt. Expires

250 S. Laura
Wichita, KS

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



SUBPOENA

To: PF-7, LLC

ODS File No. 21-005

IN THE NAME OF THE STATE OF OKLAHOMA, and pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2019),

YOU ARE COMMANDED TO PRODUCE in compliance with the Definitions and Instructions sections included herein, all documents, records, and materials described in Appendix "A", attached hereto and incorporated herein by reference, before the Administrator, or her designated representative(s), at 204 North Robinson, Suite 400, Oklahoma City, Oklahoma, or via electronic upload at <http://www.securities.ok.gov/DocumentDelivery>, **on or before Wednesday, September 2, 2020 at 12:00 p.m.**

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 11th day of August, 2020.

(SEAL)

A handwritten signature in cursive script, appearing to read "Melanie Hall".

Melanie Hall, Administrator
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102
(405) 280-7700

EXHIBIT

I _____

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

Definitions

1. As used herein, the terms "*you*" or "*your*" refer to **PF-7, LLC**, and all "affiliates" thereof; all employees thereof; and all agents, representatives, attorneys or other persons acting or purporting to act on behalf thereof.

2. As used herein, the term "*affiliates*" when used to indicate a relationship with any person, shall mean (a) a corporation or organization of which such person is an officer, partner or member or is, directly or indirectly, the beneficial owner of 10 percent or more of any class of equity securities or membership interest(s); (b) any trust or other estate in which such person has a substantial beneficial interest or as to which such person serves as trustee or in a similar capacity; and (c) any relative or spouse of such person, or any relative of such spouse, who has the same home as such person or who is a director or officer of an entity described in subsection (a) above, or any of its parents or subsidiaries.

3. As used herein, the term "*Department*" shall refer to the Oklahoma Department of Securities.

4. As used herein, the terms "document" and "writing" shall mean, any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any ESI item, invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced.

5. As used herein, "Electronically Stored Information" ("ESI") shall mean all stored computer generated data, and associated metadata, including, but not limited to, word processing, spreadsheet, database, instant message, graphic, chart and presentation, electronic mail message, electronic facsimile, any digital form for representing an electronic document (such as the ISO 32000 format) and scanned material files regardless of its storage method including, but not limited to, removable hard drives, removable storage media, optical disks, flash memory, personal digital assistants, smart phones, online and/or "cloud" storage, backup and archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, require you to state his or her full name and residential, business and electronic mail addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, require you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and/or control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

7. As used herein, the term "person" shall mean an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity;

8. As used herein, the terms "pertaining to," "relation," "relating to," "related to," or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

9. The following rules of construction apply to this Subpoena:

- a. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope; and
- b. the use of the singular form of any word includes the plural and vice versa.

Instructions

1. Documents required by the Subpoena shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Subpoena to which it relates.
2. Documents required by the Subpoena must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be produced to the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents requested are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Instant Message production should be in the Yahoo!™ Messenger version 6.x to 8 format or must:
 - a. Be in a tab delimited, quotation mark (") text qualified, text file;
 - b. Include, at a minimum, the following fields: DATE, TIME, FROM, TO, CONVERSATION TEXT, CONVERSATION INDEX; and
 - c. Include field names in the first row of the text file.
9. Audio and video file production must:
 - a. Be produced in a format that is playable using Microsoft Windows Media Player™; and
 - b. For telephonic recordings, include a tab delimited, quotation mark (") text qualified, text file with the following metadata fields, at a minimum:

¹ Assistance complying with technical requirements may be attained by calling the Department's Information Systems Administrator at (405) 280-7710. The subpoenaed person shall, at all times, retain the legal obligation and responsibility of complying with the *Subpoena*.

CALLER_NAME, CALLING_NUMBER, DATE, TIME, CALLED_PARTY, CALLED_NUMBER and FILENAME. The filename must match exactly the name used to name the corresponding audio file. The field names must be included in the first row of the text file.

10. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when produced to the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
11. Exception files shall be provided to the Department. The Exception file shall list, at a minimum: (a) the error(s) preventing the production of the file(s); (b) the file(s) name(s) and extension(s); (c) the file(s) creator(s), custodian(s) and date(s) of creation; and (d) a brief summary of the file(s) content.
12. Files that are listed in the Exception file shall temporarily satisfy the Subpoena, until such time as the file can be produced electronically, by producing the file in a hardcopy format to the Department.
13. Should any document(s), required to be produced by the Subpoena, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
14. Should any document(s) required to be produced by the Subpoena have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.
15. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.
16. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.
17. Indicate by separate affidavit whether a diligent search has been made for the subpoenaed documents and whether you have produced all of the documents required by the Subpoena.

Appendix "A"

You are commanded to produce the following items within your possession, custody or control for the time period of January 1, 2018 to the present:

1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note issued by **PF-7, LLC** ("Promissory Note").
2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments made by and/or to each such person.
3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.
4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commissions, dividends, or other compensation paid to each such person.
5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.
6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.
7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.
8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.
10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.
11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.
12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.
13. All of your financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.
14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of August, 2020, a true and correct copy of the above and foregoing *Subpoena* was mailed by certified mail, restricted delivery, return receipt requested, with postage prepaid thereon, addressed to:

PF-7, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037


Brenda London, Paralegal

MELANIE HALL
ADMINISTRATOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES

August 11, 2020

PF-7, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037

Re: Premier Global Corporation
ODS File No. 21-005

Dear Mr. Frazee:

Pursuant to an investigation being conducted by the Oklahoma Department of Securities ("Department"), the Administrator of the Department has issued the attached Subpoena.

The Subpoena requires the production of certain documents on or before the date specified in the Subpoena. Certain documents required by this Subpoena must be produced in an electronic format in accordance with the Definitions and Instructions sections of the Subpoena.

Please be advised that you have the right to consult with and be represented by counsel in connection with this matter. If you have any questions about the Subpoena, please contact Patty Labarthe at (405) 280-7735 or plabarthe@securities.ok.gov. You may also contact me at (405) 280-7709 or smullins@securities.ok.gov.

Respectfully,

Shaun Mullins

Shaun Mullins
Enforcement Attorney

Attachment

346P 21-005 Smm

SENDER: COMPLETE THIS SECTION

- ☒ Complete items 1, 2, and 3.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

PF-7, LLC
Resident Agent Jeffrey Frazee
620 N. Mulberry Road
Derby, KS 67037



9590 9402 2617 6336 3885 97

2. Article Number (Transfer from service label)

7016 1970 0001 1606 8038

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *MT*

☐ Agent
☐ Addressee

B. Received by (Printed Name)

Mekyla Jan

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

C19

C09

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☒ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restr Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery



John D. Russell
Direct Line: (918) 595-4806
jrussell@gablelaw.com

1100 ONEOK Plaza
100 W. 5th Street
Tulsa, OK 74103-4217
(918) 595-4800
www.gablelaw.com

24 November 2020

BY EMAIL – Plabarthe@securities.ok.gov

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 North Robinson, Suite 400
Oklahoma City, OK 73102
Attention: Patricia A. Labarthe, Enforcement Attorney

Re: Premier Global Corporation, et. al
ODS 21-005

Dear Ms. Labarthe:

In response to your 5 November 2020 letter regarding document requests to Premier Global Corporation; Premier Factoring Group, LLC; Premier Factoring, LLC; PF-2, LLC; PF-3, LLC; PF-4, LLC; PF-5, LLC; PF-6, LLC; and PF-7, LLC ("Premier Group"), we are providing the following supplemental responses. As noted in the original objections, the requests seek thousands of pages of records relating to noteholders outside the state of Oklahoma. Our productions to date have been limited to Oklahoma noteholders. We understand the Department disagrees with our interpretation of the scope of the Department's subpoenas. That said, the documents relating to each entity issuing private placement memoranda are identical except for the name of the noteholder, the location of the noteholder, and the amount of the loan. If the Department's requests were taken literally, it would require turning over every document held by each entity.

We are confident that the documents produced so far, as well as supplemental documents to be produced, will provide sufficient information for the Department to conduct an investigation. We believe that once the Department has had an opportunity to review the documents, it will understand the transactions and close its investigation. We are happy to discuss this further as part of a meet and confer process. With respect to the specific inquiries in your letter, here are the entities' supplemental responses.

Many of the requests noted in your letter inquire about Premier Factoring Group, LLC. This entity was formed earlier in 2020 and as of this date has done no business in the state of Oklahoma.

Request for Production No. 1. All promotional materials or literature, solicitation letters, prospectuses, private placement memoranda, subscription agreements, promissory notes, loan origination forms, and all other documents used in connection with the offer and/or sale of any promissory note by [Premier Group entities] ("Promissory Note").

Response: Premier Group previously produced private placement memoranda, promissory notes, subscription agreements and related documents for Premier Factoring, PF-2, PF-3, PF-4, PF-5, PF-6 and PF-7 [see sample document at PREMIER_00004113]. Premier Group has no other responsive documents to produce with respect to Premier Global Corporation; Premier Factoring Group, LLC; Premier Factoring, LLC; PF-2, LLC; PF-3, LLC; PF-4, LLC; PF-5, LLC; PF-6, LLC; and PF-7, LLC.

Request for Production No. 2. Documents identifying each person to whom you issued, offered and/or sold any Promissory Note identified in the documents provided in response to Item Number 1 above, as well as the date that each Promissory Note was issued, offered and/or sold, the amount thereof, and documentation of all payments by and/or to each such person.

Response: Premier Group previously produced promissory notes identifying each person to whom it was issued, offered and/or sold to for the factoring companies Premier Factoring, PF-2, PF-3, PF-4, PF-5, PF-6 and PF-7 [see example at PREMIER_00004113]. Additionally, Premier Group previously produced bank records reflecting payments made and received [see examples at PREMIER_00006888, PREMIER_00006622 and PREMIER_00013790-00016946]. Premier Group has no other responsive documents to produce.

Request for Production No. 3. All communications between you and the persons identified in the documents provided in response to Item Number 2 above including, but not limited to, all correspondence, notes of conversations, emails and/or other electronically stored or communicated information.

Response: Premier Group's communications with the persons identified in the documents provided in response to Item Number 2 are limited; it is continuing its search for responsive document and will produce any communications. There are also limited communications documented with some of these persons identified in records produced by DDI; those communications will be produced with its production.

Request for Production No. 4. Documents identifying each person and/or contractor involved in the offer or sale of any Promissory Note identified in the documents provided in response to Item Number 1 above, including all contractor services agreements; non-disclosure, non-circumvention and confidentiality agreements; and documents identifying all contractors' fees, commission, dividends, or other compensation paid to each such person.

Response: Premier Group previously produced responsive documents [see example at PREMIER_00005560 and PREMIER_00007488]. Premier Group has no other responsive documents to produce.

Request for Production No. 5. Documents identifying all invoices and receivables acquired and/or purchased by you including the names of all vendors and payees of such invoices and receivables.

Response: Premier Group previously produced responsive documents [see example beginning at PREMIER_00004375. As noted in its objection to this request, a production of every record back to January 1, 2018, is overly broad and unduly burdensome. Premier Group produced a large sample of documents beginning at PREMIER 00004375. These documents are representative of the documents that would be produced if Premier Group were to go back and produce every invoice and receivable document for the entire period.

Request for Production No. 6. All documents relating to any indemnification agreement entered into or acquired by you including, but not limited to, all indemnification contracts or agreements, any payment made or received for the contracts or agreements, proofs of claim, audited or unaudited financial information of any indemnitor, evidence of claim payments made to you by any indemnitor, and/or refunds paid by you to any indemnitor.

Response: DDI will produce as part of its production a copy of indemnification certificates in its possession. Premier Group will produce its agreement with Midwest.

Request for Production No. 7. Documents identifying the exemption from registration under the Act, if any, you relied upon in connection with the issuance, offer and/or sale, in and/or from Oklahoma, of each Promissory Note identified in the documents provided in response to Item Number 1 above, and the documentation demonstrating the qualification for the exemption.

Response: Premier Group relied on the Kansas and Oklahoma securities laws, and advice of counsel who prepared the private placement memoranda, for the exemption from registration.

Request for Production No. 8. All documents utilized to determine whether each person identified in the documents provided in response to Item Number 2 above is "accredited" as that term is defined in Rule 501 of Regulation D (17 C.F.R. § 230.501), promulgated by the United States Securities and Exchange Commission.

Response: The documents provided by each noteholder represent that the noteholder is an accredited investor.

Request for Production No. 9. All organizational documents relating to you and those of any affiliates including, but not limited to, articles of incorporation, by-laws, articles of organization, operating agreements, minutes, resolutions, business plans, and other similar documents.

Response: Premier Group produced articles of organization and operating agreements on September 10, 2020 [see documents starting with numbers PREMIER_00001088 and PREMIER_00001199]. Premier Group has no other responsive documents to produce.

Request for Production No. 10. Documentation identifying all open and closed accounts into which funds received from persons identified in the documents provided in response to Item Number 2 above were deposited or transferred including, but not limited to, checking, savings, credit card, certificate of deposit, loan, safe deposit box, trust, and escrow, by the name the account is carried in, the name and mailing address of the financial institution, the account number, the type of account, and the name(s) of person(s) authorized to sign on the account.

Response: Premier Group produced responsive documents [see documents starting at PREMIER_00004375]. Premier Group has no other responsive documents to produce.

Request for Production No. 11. Documentation identifying all of your members, officers, directors, managers, and employees as well as the title, job responsibilities, and time period of employment or service of each such member, officer, director, manager or employee.

Response: Premier Group previously produced articles of organization and operating agreements, which identify the members and managers [see documents starting with numbers PREMIER_00001088 and PREMIER_00001199]. Premier Group has no other responsive documents to produce.

Request for Production No. 12. All documents relating to any contract or agreement for work or services provided to you by any member, officer, director, manager or employee identified in Item Number 11 above.

Response: Premier Group has no responsive documents to produce.

Request for Production No. 13. All financial statements, audited or unaudited, monthly, quarterly or annual, for the last three years, and all federal and state tax return filings for the last three years.

Response: Premier Group previously produced responsive documents [see example at PREMIER_00000132]. Premier Group has a supplemental production for records just completed by their accountants; those records will be produced. Upon production of those records, there are no other responsive documents to produce.

Request for Production No. 14. All documentation identifying any criminal, civil, and/or administrative investigation and/or action regarding you and, if applicable, the resolution of such action.

Response: As stated in its responses, Premier Group has no responsive records.

Please call us if you have questions.

Patricia A. Labarthe
24 November 2020
Page 5 of 5

Yours very truly,

A handwritten signature in black ink, appearing to read "John D. Russell", with a long horizontal flourish extending to the right.

John D. Russell
For the Firm

Patty Labarthe

From: Shaun Mullins
Sent: Thursday, August 12, 2021 11:40 AM
To: John Russell; Andrew J. Hofland
Cc: Patty Labarthe; Jennifer Shaw
Subject: Premier Global Corporation; ODS File No. 21-005

Good Afternoon John,

When we met on the 30th and reviewed the materials you provided we also discussed several options relating to production of certain documents subject to subpoenas issued to Premier and its affiliated entities. You offered to discuss the methods and types of production with your client and agreed that we would further refine the options. In that regard, please review the following.

Detail Reports

In previous document production, Premier has provided certain profit and loss statements for Premier Global Corporation, Premier Factoring, LLC and the various Premier established factoring entities. Those statements contain figures comprising "Total Income" in the first section of each such statement followed by "Total Expenses". We also understand from previous discussions that Premier uses Quickbooks accounting software. If that is not the case please let us know.

Please provide the Quickbooks generated reports that identify the sources supporting the "Total Income" lines on the profit and loss statements for Premier Global Corporation, Premier Factoring and the affiliated PF entities for the years 2018 and 2019. The Quickbooks generated reports should identify all subcategories of each line item comprising "Total Income" as well as the customer, contractor or client from whom the income was generated and the amount of income received from each such customers during those yearly periods as well as the bank account into which the transactions were credited. Please also provide the same reports for offsetting "Total Expense" line items in such statements. The reports should display at least the following columns: date, number, transaction type, name (i.e., payee/payor), memo/description, amount, and the bank account into/from which the transaction was credited/debited.

For example, the 2019 P&L statement for Premier Global Corporation (Premier Bates number 00017107) states total income of \$190,047,579.63. Of that figure, the vast majority is attributable to "Construction Billing and Services Income." For that line item, please provide the Quickbooks available report that identifies each subcategory of "Construction Billing and Services Income" and identifies the individual name of such source and the total amounts received from that source for the time period of the statement as well as the account number into which the income was deposited. Likewise, please identify any subcategories of expense items that are not identified in the produced statements in the manner described above.

Such reports should be readily available. If Premier is using Quickbooks Online, either the most recent version or the previous version with a relatively recent update installed, the Total Income reports can be generated by using the "Reports" function followed by the "Sales Items by Customer" option and then "Summary Report." The same basic steps are available for generating the above described reports for Total Expense items. These functions are used/imported by that software to generate P&L statements as well as income statements such as the ones previously produced by Premier.

Lastly, Premier produced balance sheets for certain entities containing line items for "factored invoices" in the assets sections. Please provide a corresponding Quickbooks generated report that identifies the individual factored invoices comprising that asset line item for the same time periods and entities.

Supporting Document Samples

EXHIBIT

K

Please provide all documents supporting the individual Total Income detail report entries such as the underlying factoring applications, invoices and related bank records for all factoring activity occurring on the first and last days of each quarter of 2018 and 2019 for the entities referenced above. Similar to the examples you provided on the 30th, please provide the supporting documents that follow each initial application out to its conclusion, such as repayment into the account of the appropriate PF entity, even though it will likely be beyond the date of the initial application.

Please provide the detail reports by August 20th and the supporting document samples by the 27th. As you explained this morning, our most recent call schedule is undecided due to the desire by Premier to provide some additional information although when they intend to do that has not yet been specified. If this is helpful, I checked our schedules for next week and it looks like Wednesday (18th) at 10:00 a.m. is pretty much it for us. Hopefully, that date will work. As always, we appreciate your assistance. If you have any questions please contact us.

Sincerely,
Shaun

Patty Labarthe

From: Patty Labarthe
Sent: Friday, September 10, 2021 4:14 PM
To: John Russell; Andrew J. Hofland
Cc: Jennifer Shaw; Shaun Mullins
Subject: RE: Premier Global Corporation; ODS File No. 21-005

Dear John:

I wanted to briefly recap our call yesterday regarding the response by Premier to the Department's August 12, 2021 email to you. You represented that you will provide a written response to the email in addition to providing documents in further response thereto. If the responsive information cannot be provided in the specific format requested by the Department, Premier will provide the information in an alternative format that is fully responsive to the requests set forth in the email. We will have a status call with you at 10:00 a.m. on Wednesday, September 22, 2021, and follow up with a meeting on September 29, 2021 at 10:00 am in our offices to resolve the outstanding requests. Thank you for your efforts in this matter. Have a nice weekend.

Sincerely,

Patty Labarthe

From: Shaun Mullins
Sent: Thursday, August 12, 2021 11:40 AM
To: John Russell <jrussell@gablelaw.com>; Andrew J. Hofland <ahofland@gablelaw.com>
Cc: Patty Labarthe <PLabarthe@securities.ok.gov>; Jennifer Shaw <JShaw@securities.ok.gov>
Subject: Premier Global Corporation; ODS File No. 21-005

EXHIBIT

L

Good Afternoon John,

When we met on the 30th and reviewed the materials you provided we also discussed several options relating to production of certain documents subject to subpoenas issued to Premier and its affiliated entities. You offered to discuss the methods and types of production with your client and agreed that we would further refine the options. In that regard, please review the following.

Detail Reports

In previous document production, Premier has provided certain profit and loss statements for Premier Global Corporation, Premier Factoring, LLC and the various Premier established factoring entities. Those statements contain figures comprising "Total Income" in the first section of each such statement followed by "Total Expenses". We also understand from previous discussions that Premier uses Quickbooks accounting software. If that is not the case please let us know.

Please provide the Quickbooks generated reports that identify the sources supporting the "Total Income" lines on the profit and loss statements for Premier Global Corporation, Premier Factoring and the affiliated PF entities for the years 2018 and 2019. The Quickbooks generated reports should identify all subcategories of each line item comprising "Total Income" as well as the customer, contractor or client from whom the income was generated and the amount of income received from each such customers during those yearly periods as well as the bank account into which the transactions were credited. Please also provide the same reports for offsetting "Total Expense" line items in such statements. The reports should display at least the following columns: date, number, transaction type, name (i.e., payee/payor), memo/description, amount, and the bank account into/from which the transaction was credited/debited.

For example, the 2019 P&L statement for Premier Global Corporation (Premier Bates number 00017107) states total income of \$190,047,579.63. Of that figure, the vast majority is attributable to "Construction Billing and Services Income." For that line item, please provide the Quickbooks available report that identifies each subcategory of "Construction Billing and Services Income" and identifies the individual name of such source and the total amounts received from that source for the time period of the statement as well as the account number into which the income was deposited. Likewise, please identify any subcategories of expense items that are not identified in the produced statements in the manner described above.

Such reports should be readily available. If Premier is using Quickbooks Online, either the most recent version or the previous version with a relatively recent update installed, the Total Income reports can be generated by using the "Reports" function followed by the "Sales Items by Customer" option and then "Summary Report." The same basic steps are available for generating the above described reports for Total Expense items. These functions are used/imported by that software to generate P&L statements as well as income statements such as the ones previously produced by Premier.

Lastly, Premier produced balance sheets for certain entities containing line items for "factored invoices" in the assets sections. Please provide a corresponding Quickbooks generated report that identifies the individual factored invoices comprising that asset line item for the same time periods and entities.

Supporting Document Samples

Please provide all documents supporting the individual Total Income detail report entries such as the underlying factoring applications, invoices and related bank records for all factoring activity occurring on the first and last days of each quarter of 2018 and 2019 for the entities referenced above. Similar to the examples you provided on the 30th, please provide the supporting documents that follow each initial application out to its conclusion, such as repayment into the account of the appropriate PF entity, even though it will likely be beyond the date of the initial application.

Please provide the detail reports by August 20th and the supporting document samples by the 27th. As you explained this morning, our most recent call schedule is undecided due to the desire by Premier to provide some additional information although when they intend to do that has not yet been specified. If this is helpful, I checked our schedules for next week and it looks like Wednesday (18th) at 10:00 a.m. is pretty much it for us. Hopefully, that date will work. As always, we appreciate your assistance. If you have any questions please contact us.

Sincerely,
Shaun